

IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF PUERTO RICO

IN RE:

ROBERT FRANCIS LOPEZ ACEVEDO

CASE NO 14-02177 MCF

CHAPTER 13

**DEBTOR'S REPLY TO MOTION TO DISMISS, DOCKET NO. 65  
FILED BY SCOTIABANK DE PUERTO RICO**

TO THE HONORABLE COURT:

COMES NOW, ROBERT FRANCIS LOPEZ ACEVEDO, debtor in the above captioned case, through the undersigned attorney, and very respectfully states and prays as follows:

1. Scotiabank de Puerto Rico ("Scotiabank") filed a *Motion to Dismiss*, dated September 29, 2015, docket no. 65, basically stating that the debtor is in arrears in the direct post-petition mortgage loan payments to said creditor.

2. The debtor hereby respectfully replies to Scotiabank's motion for dismissal stating that on this same date, October 02, 2015, he filed a post-confirmation modified Plan whereby the aforementioned post-petition arrears are to be paid through the proposed modified Plan, the debtor to continue making current direct post-petition payments to Scotiabank commencing in October, 2015.

3. Based on the aforementioned, the debtor respectfully requests this Honorable Court deny the Scotiabank's *Motion to Dismiss*, dated September 29, 2015, docket no. 65 since upon confirmation of debtor's proposed modified Plan, said motion for dismissal become moot.

WHEREFORE debtors respectfully pray that Scotiabank's motion to dismiss, docket no. 65, be denied.

I HEREBY CERTIFY that on this same date a copy of this notice was sent via electronically with the Clerk of the Court using CM/ECF systems which will send

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notifications of such to the Chapter 13 Trustee; Jose F. Cardona Jimenez, Esq., *Cardona Jimenez Law Office, PSC*, Counsel for Scotiabank PR; and also certify that I have mailed by United States Postal Service copy of this motion to the following non-participant: debtor, Robert Francis Lopez Acevedo, RR 1 Box 3233-3 Cidra PR 00739, in the above captioned case.

**RESPECTFULLY SUBMITTED.** In San Juan, Puerto Rico, this 2<sup>nd</sup> day of October, 2015.

/s/Roberto Figueroa Carrasquillo  
USDC #203614  
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